

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

REALTIME DATA, LLC D/B/A/ IXO,)		
)		
Plaintiff,)	Civil Action Nos.	11-cv-6696-KBF
vs.)		11-cv-6701-KBF
)		11-cv-6704-KBF
CME GROUP INC., et al.,)		
)		
Defendants.)		

**HSBC DEFENDANTS' NOTICE AND JOINDER IN CERTAIN
REPLIES IN SUPPORT OF MOTIONS FOR SUMMARY JUDGMENT**

Defendants HSBC Bank USA, National Association, and HSBC Securities USA, Inc. (collectively, "HSBC") respectfully file this Notice and Joinder in Certain Replies in Support of Motions for Summary Judgment to be filed by certain other Defendants in this or related actions. HSBC has previously filed joinder papers relating to the original Motions for Summary Judgment to which these Replies pertain. Specifically, HSBC hereby joins in the following Replies in Support of Motions for Summary Judgment:

A. CME Defendants' Motion for Summary Judgment of Noninfringement Based on the Lack of Determining a Data Block or Field Type (Original Motion filed in Cause No. 11-cv-6697; Dkt. No. 659) ("Data Type Motion");

B. NYSE and OPRA Defendants' Motion for Summary Judgment of Noninfringement Based on the Absence of Encoding, Data Block (or Field) Type, and Selecting Limitations (Original Motion filed in Cause No. 11-cv-6697; Dkt. No. 680) ("Encoding Motion");

C. NYSE and OPRA Defendants' Motion for Summary Judgment of Noninfringement: Data Stream, Content Independent Encoding, and Lossless (Original Motion filed in Cause No. 11-cv-6697; Dkt. No. 697) ("Data Stream Motion");

D. NYSE and OPRA Defendants' Motion for Summary Judgment of Noninfringement: Descriptor Limitation (Original Motion filed in Cause No. 11-cv-6697; Dkt. No. 687) ("Descriptor Motion"), a Motion for which HSBC is a signatory, but which is included here in order to avoid any confusion as to the grounds on which HSBC seeks summary judgment; and

E. Downstream Defendants' Motion for Summary Judgment of Non-Infringement of the Asserted Encoding-Decoding Claims on the Grounds of No Divided Infringement (Original Motion filed in Cause No. 11-cv-6696) ("Divided Infringement Motion" and collectively with the other motions referenced above, the "Motions").

HSBC respectfully requests that this Court grant the Motions and enter summary judgment in favor of HSBC on each of the Asserted Claims (claims 95, 97, 108, and 112 of the '651 Patent) for the reasons as set forth in each of the Motions and their respective Replies.

August 21, 2012

Respectfully submitted,

/s/ M. Scott Fuller

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ATTORNEYS FOR THE HSBC DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing document were served on counsel of record via email on August 21, 2012.

/s/ M. Scott Fuller